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February 16, 2006

**Via Electronic Filing**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: IB Docket No. 05-220  
IB Docket No. 05-221**

Dear Ms. Dortch:

Mobile Satellite Ventures Subsidiary LLC ("MSV") is writing to correct the inaccurate claims that Globalstar LLC ("Globalstar") makes regarding MSV in the Petition for Reconsideration it filed in the above-referenced proceeding.<sup>1</sup> Globalstar mistakenly claims that MSV lacks a record of service to public safety users and that it (Globalstar) is the only Mobile Satellite Service provider with the ability to offer an Ancillary Terrestrial Component ("ATC") in the near term. *Globalstar Petition* at 4-7.

In fact, MSV has had an unparalleled history of serving the communications needs of public safety users since it began providing service in 1996. For instance, during the Hurricane Katrina relief effort and in response to Hurricane Rita, MSV quickly provided service to public safety and relief organizations in the affected area, including the American Red Cross, the Federal Emergency Management Agency, the Louisiana Department of Homeland Security, the Mississippi Emergency Management Agency, and the Texas Urban Search and Rescue Team.

MSV is the pioneer in proposing and developing ATC, with its breakthrough application in 2001. MSV has made a substantial and sustained investment in the research and development, planning, and implementation of its interim ATC; using its existing satellites, MSV is scheduled to commence operations as early as late 2007. In contrast, MSV has seen no evidence that Globalstar has made the kind of investment needed to deploy high-quality, multi-featured, disaster-proof, efficient ancillary terrestrial service. As discussed in the *Globalstar ATC Order*, without a further modification of its license, Globalstar is incapable of providing robust service to a handheld device.<sup>2</sup>

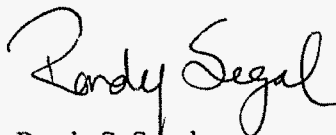
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<sup>1</sup> See *Use of Returned Spectrum in the 2 GHz Mobile Satellite Service Frequency Bands, Order*, IB Docket Nos. 05-220 and 05-221, FCC 05-204 (Dec. 8, 2005); *Petition of Globalstar for Reconsideration*, IB Docket Nos. 05-220 & 05-221 (filed Jan. 9, 2006) ("*Globalstar Petition*").

<sup>2</sup> See *Globalstar LLC, Order and Authorization*, DA 06-121, at ¶¶ 33-34 (Jan. 20, 2006) ("*Globalstar ATC Order*").

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Very truly yours,

A handwritten signature in black ink that reads "Randy Segal". The signature is fluid and cursive, with the first name "Randy" and last name "Segal" clearly distinguishable.

Randy S. Segal  
Senior Vice President, General Counsel, and Secretary  
MOBILE SATELLITE VENTURES SUBSIDIARY LLC  
10802 Parkridge Boulevard  
Reston, Virginia 20191

## CERTIFICATE OF SERVICE

I, Sylvia A. Davis, a secretary with the law firm of Pillsbury Winthrop Shaw Pittman LLP, hereby certify that on this 16<sup>th</sup> day of February 2006, I served a true copy of the foregoing by first-class United States mail, postage prepaid, upon the following:

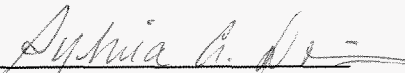
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Sylvia A. Davis